## REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1, 4, 6-15, 17-20, 23-26, 29-38, 40, and 41 are pending in the application, with claims 1, 12, 20, 26, and 33 being independent. Applicant cancels claim 2 without prejudice, waiver, or disclaimer of the subject matter. Applicant amends claims 1, 12, 20, 26 and 33 to further clarify features of the claimed subject matter. The original specification and drawings support these claim amendments, for example [0052], [00122], and Figure 2. Therefore, claims 1, 4, 6-15, 17-20, 23-26, 29-38, 40, and 41 are presented and directed to subject matter of the original disclosure.

### CLAIM REJECTIONS UNDER 35 U.S.C. § 102

Claims 1, 4, 6-8, 10-14, 17-20, 24-26, 29, 31-38, and 41 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,369,835 B1 (Lin et al.). Applicant respectfully traverses the rejection.

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends **independent claim 1** to clarify further features of the subject matter. Amended claims 1 now recites a method comprising (emphasis added):

> examining a plurality of nodes within a media timeline, wherein:
> the media timeline is for exposure over an application programming interface (API); and
> one or more said nodes reference respective media;
> dividing the media timeline into one or more presentations, wherein each said presentation describes a

rendering of the media for a particular interval of time, and wherein each said presentation describes a collection of software components that, when executed, provides the described rendering of the media for the particular interval of time, *wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink*; and

the method further comprises:

loading each said software component described by a first said collection;

executing each said software component described by the first said collection; and

loading each said software component described by a second said collection.

Applicant respectfully submits that the Office has failed to show that Lin discloses such a method.

### *The Office fails to show that Lin discloses a method comprising the claimed collection of software components*

The Office has failed to show that Lin discloses a method comprising the claimed collection of software components. The Office cites the following sections from Lin as disclosing the claimed software components: Column 12, lines 53-65; Column 13, lines 3-17 and lines 18-37; and Column 18, lines 20-24. For the convenience of the Office, those cited sections are excerpted below.

**Lin Reference**
The logic in FIG. 9 moves from a start block to a decision block 240 where a test is made to determine whether the background audio for a slide(s) in the presentation is selected for saving in the movie file. If true, the logic moves to a block 242 where a background audio sample is generated and added to an audio track that is associated with a video sample in the movie file that corresponds to the slide(s) in the presentation that has background audio.

The background audio sample may be selected to run from the start of playing the movie file until its end, or it may be selected to run for a defined interval. It is also envisioned that several background audio tracks may be included in the movie file. (Col. 12, lines 53-65).

Next, the logic proceeds from the block 242 to a decision block 244 where a test is made to determine if voice narration audio is selected to be included in the movie file. Also, if the determination at the decision block 240 is false, the logic will advance directly to the decision block 244. When the determination at the decision block 244 is true, i.e., voice narration audio is selected for the movie file, the logic proceeds to a block 246 where voice narration audio samples are generated and added to a voice narration audio track that is associated with (same start time as) a video sample in the movie file that corresponds to the slide(s) in the presentation that has voice narration audio. Typically, one audio narration track is provided for each narrated slide. However, it is also envisioned that multiple audio narration tracks may be provided for a narrated slide. (Col. 13, lines 3-17).

The logic proceeds from the block 246 to a decision block 248 where a test is made to determine if sound effect audio is selected to be included with an object in the movie file. Also, if the determination at the decision block 244 is false, the logic will advance directly to the decision block 248. If the determination at the decision block 248 is true, i.e., the sound effect audio is selected for an object(s) in the movie file's video sample, the logic proceeds to a block 250 where a sound effect audio sample(s) are generated and added to the sound effect audio track(s) in such a way that they are linked to the object(s) in the movie file for complete playback when the object(s) is selected. When the display (or activation of interactive sprite) of the linked object is selected during the play back of the movie file, the associated sound effect audio sample(s) are played. The present invention can provide one sound effect track in the movie file for each slide associated with an object with a sound effect. It is also envisioned that sound effect references may be disposed on a single track and each reference would point to a sound effect sample that resides in an audio media included with the movie file. (Col. 13, lines 18-37).

Additionally, it is envisioned that the movie within a movie and the inline movie option may be employed to integrate home video clips and video clips from other application into the play back of the movie file for the slide show presentation. (Col. 18, lines 20-24).

However, no where in these sections does Lin describe the claimed software components. Rather, the cited sections from Columns 12 and 13 describe transforming objects in the slide show presentation into audio tracks for a movie file. (Col. 4, lines 59-60). Column 18 of Lin describes a movie within a movie and an inline movie option. (Col. 18, lines 20-24).

In contrast, Applicant's amended claim 1 recites *"dividing the media timeline into one or more presentations, wherein each said presentation describes a rendering of the media for a particular interval of time, and wherein each said presentation describes a collection of software components that, when executed, provides the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink."* To assist the Office in appreciating the claimed subject matter, the following excerpt is reproduced from the Applicant's Specification.

### Applicant's Specification, [0051 and [0052]

In an embodiment, the media foundation 204 exposes one or more application program interfaces that can be called by the application 202 to interact with the media 206(g). For example, the media foundation 204 may be thought of as existing at an "infrastructure" level of software that is executed on the computer 102 of FIG. 1. In other words, the media foundation 204 is a software layer used by the application 202 to interact with the media 206(g). The media foundation 204 may be utilized to control a number

of aspects of the media 206(g), such as output, rendering, storage, and so on. Thus, the media foundation 204 may be utilized such that each application 202 does not have to implement separate code for each type of media 206(g) that may be used in the system 200. In this way, the media foundation 204 provides a set of reusable software components to do media specific tasks.

The media foundation 202 may utilize several components among which include the media timeline 122, the timeline source 124, a media source 210, a media processor 212, a media session 214, the media engine 208, a source resolver 216, one or more transforms 218, one or more media sinks 220, 222, and so on. One advantage of various illustrated and described embodiments is that the system 200 is a pluggable model in the sense that a variety of different kinds of components can be utilized in connection with the systems described herein. Also included as a part of system 200 is a destination 224, which is discussed in more detail below. In at least one embodiment, however, the destination 224 is an object that defines where a presentation is to be presented (e.g. a window, disk file, and the like) and what happens to the presentation. That is, the destination may correspond to one or more of the media sinks 220, 222 into which data flows.

As the Office has failed to show that Lin discloses these recited features, Applicant respectfully submits that claim 1 is not anticipated by Lin. Therefore, Applicant respectfully requests that the §102 rejections be withdrawn.

**Dependent claims 4, 6-8, and 10-11** depend directly from independent claim 1 and thus are allowable as depending from an allowable base claim. Dependent claims 4, 6-8, and 10-11 are also allowable for their own recited features that, in combination with those recited in claim 1, are not shown by the Office to be disclosed by Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that the § 102 rejections be withdrawn.

### _Independent Claim 12_

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends **independent claim 12** to clarify further features of the subject matter. Amended claim 12 now recites a method comprising (emphasis added):

> receiving a call from an application over an API for rendering a media timeline, wherein:
>
> the media timeline includes a plurality of nodes;
>
> two or more said nodes reference respective media; and
>
> the media timeline defines one or more presentations including said media;
>
> rendering the media timeline to output each said presentation, wherein the rendering further comprises dividing the media timeline into one or more presentations such that each said presentation describes a collection of software components utilized to render said media for a particular interval of time, _wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink_; and
>
> the method further comprises:
>
> loading each said software component described by a first said collection;
>
> executing each said software component described by the first said collection; and
>
> loading each said software component described by a second said collection.

Applicant respectfully submits that the Office has failed to show that Lin discloses such a method and is allowable for reasons similar to those discussed above with respect to claim 1. For example, the Office has failed to show that Lin discloses *"rendering the media timeline to output each said presentation, wherein the rendering further comprises dividing the media timeline into one or more presentations such that each said presentation describes a collection of software components utilized to render said media for a particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink,"* as recited in Applicant's amended claim 12. As the Office has failed to show that Lin discloses these recited features, Applicant respectfully submits that claim 12 is not anticipated by Lin. Therefore, Applicant respectfully requests that the §102 rejections be withdrawn.

**Dependent claims 13, 14, and 17-19** depend directly from independent claim 12 and thus are allowable as depending from an allowable base claim. Dependent claims 13, 14, and 17-19 are also allowable for their own recited features that, in combination with those recited in claim 12, are not shown by the Office to be disclosed by Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that § 102 rejections be withdrawn.


### *Independent Claim 20*

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends **independent claim 20** to clarify

further features of the subject matter. Amended claim 20 now recites one or more computer-readable media comprising computer executable instructions that, when executed on a computer, direct the computer to divide a media timeline into one or more presentations, wherein (emphasis added):

> the media timeline is for exposure via an API to one or more applications;
> the media timeline includes a plurality of nodes;
> at least two said nodes reference respective media; and
> each said presentation describes rendering of respective said media for a particular interval of time, wherein each said presentation describes a collection of software components that, when executed, provide the described rendering of said media for the particular interval of time, and ***wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink***; and
> the one or more computer-readable media further comprises computer executable instructions that, when executed on the computer, direct the computer to:
> > load each said software component described by a first said collection;
> > execute each said software component described by the first said collection; and
> > load each said software component described by a second said collection.

Applicant respectfully submits that the Office has failed to show that Lin discloses such a computer-readable media and is allowable fore reasons similar to those discussed above with respect to claim 1. For example, the Office has failed to show that Lin discloses *"each said presentation describes rendering of respective said media for a particular interval of time, wherein each said presentation describes a collection of software components that, when executed, provide the described rendering of said media for the particular interval of time, and wherein the collection of software components*

*include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink,*" as recited in Applicant's amended claim 20. As the Office has failed to show that Lin discloses these recited features, Applicant respectfully submits that claim 20 is not anticipated by Lin. Thus, Applicant respectfully requests that the §102 rejections be withdrawn.

**Dependent claims 24 and 25** depend directly from independent claim 20 and thus are allowable as depending from an allowable base claim. Dependent claims 24 and 25 are also allowable for their own recited features that, in combination with those recited in claim 20, are not shown by the Office to be disclosed in Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that the § 102 rejections be withdrawn.


## *Independent Claim 26*

Without conceding the propriety of the stated rejection, and only to advance the prosecution of this application, Applicant amends **independent claim 26** to clarify further features of the subject matter. Amended claim 26 now recites a system comprising (emphasis added):

> a plurality of media;
> a plurality of applications; and
> an infrastructure layer that:
>> provides an API for the plurality of applications which exposes a media timeline that describes one or more presentations of the plurality of media; and
>> manages rendering of the one or more presentations, wherein each said presentation describes rendering of said media for a particular interval of time, and wherein each said presentation describes a collection

of software components configured for dynamic loading such that the collection of software components provide the described rendering of the media for the particular interval of time, *wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink and are loaded only when needed.*

Applicant respectfully submits that no such system is disclosed by Lin.

## *Lin Fails to Disclose Claimed Dynamic Loading and Software Components*

As discussed above with respect to claim 1, the Office has failed to show that Lin discloses a system comprising the claimed collection of software components. Further, the Office has failed to show that Lin discloses the claimed dynamic loading. The Office cites Column 10, lines 43-54 of Lin as meeting the limitation of dynamic loading. For the convenience of the Office, this cited section is excerpted below.

### Lin Reference, Col. 10, lines 43-54

> The present invention defines a sample to be a chunk of data such as video, audio and text that is generated from transforming objects in the slide show presentation. A video media is employed as a container for the video samples in the movie data and an audio media is used as a container for the audio samples. The movie data includes a track data structure that references the segment (position) on the track occupied by a sample to the corresponding order and timing of the corresponding object(s) in the slide show presentation. Each track is a timeline with marks (references) that denote when the movie API should begin playing samples from an identified media (container).

However, Lin does not disclose the claimed dynamic loading. Rather, as stated in the cited section, Lin discloses movie data that includes a track data structure where each

track is a timeline with marks (references) that denote when the movie API should begin playing samples from an identified media (container). (Col. 10, lines 48-54).

In contrast, Applicant's amended claim 26 recites *"rendering of the one or more presentations, wherein each said presentation describes rendering of said media for a particular interval of time, and wherein each said presentation describes a collection of software components configured for dynamic loading such that the collection of software components provide the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink and are loaded only when needed."*

To assist the Office in appreciating the claimed subject matter, Applicant provides the following illustrative excerpt from Applicant's Specification.

### *Applicant's Specification, Page 40-41, Paragraph [00122]*

Dynamic creation and loading of nodes of a media timeline may be utilized for efficient rendering of the media timeline. By improving rendering efficiency, the media timeline may be utilized on low resource devices, such as devices having limited hardware and/or software resources. For example, dynamic creation of the media timelines may include delayed creation of the nodes of the media timeline. The children of a parent node, for instance, need not be created until needed. The delayed creation of the nodes may be utilized to improve start-up and response times for media timelines having a significant number of nodes and/or a large amount of data for each node. For instance, a media player may be utilized to create and playback a playlist from a media library that contains a significant number of selections. Creating such a playlist might require multiple queries to the media library, which may take a significant amount of time, processor and memory resources. By using delayed creation of the nodes, the playlist can be built on an "as needed" basis, thereby utilizing only as much processing

and memory resources as required by the nodes needed at any one particular time. There are a wide variety of implementations that may be utilized for dynamic creation and/or loading of nodes of a media timeline.

As these recited features are not disclosed in Lin, Applicant respectfully submits that claim 26 is not anticipated by Lin. Thus, Applicant respectfully requests that the §102 rejection be withdrawn.

**Dependent claims 29, 31, and 32** depend directly from independent claim 26 and thus are allowable as depending from an allowable base claim. Dependent claims 29, 31, and 32 are also allowable for their own recited features that, in combination with those recited in claim 14, are not shown by the Office to be disclosed by Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin and Applicant respectfully requests that the § 102 rejections be withdrawn.

## *Independent Claim 33*

Independent claim 33 recites a timeline source comprising computer instructions that, when executed by a computer, provide (emphasis added):

> means for dividing a media timeline into one or more presentations each describing a rendering of one or more media during a particular interval of time, wherein the media timeline exposes a plurality of nodes to the plurality of applications, wherein one or more said nodes reference respective said media, *and wherein the media timeline is configured for dynamic loading such that metadata included in at least one said node specifies a collection of said nodes to be loaded when the media timeline is rendered;*
> means for determining a topology for each said presentation, wherein the topology references a collection

of software components that, when executed, provides the
rendering; and
media processor means for executing the topology
for each said presentation that is described by the media
timeline.

Applicant respectfully submits that the Office has failed to show that Lin discloses such a timeline source and is allowable for reasons similar to those discussed above with respect to claim 26. For example, the Office has failed to show that Lin discloses "*means for dividing a media timeline into one or more presentations each describing a rendering of one or more media during a particular interval of time, wherein the media timeline exposes a plurality of nodes to the plurality of applications, wherein one or more said nodes reference respective said media, and wherein the media timeline is configured for dynamic loading such that metadata included in at least one said node specifies a collection of said nodes to be loaded when the media timeline is rendered,*" as recited in Applicant's claim 33. As the Office has failed to show that Lin discloses these recited features, Applicant respectfully submits that claim 33 is not anticipated by Lin. Thus, Applicant respectfully requests that the § 102 rejection be withdrawn.

**Dependent claims 34-38 and 41** depend directly from independent claim 33 and thus are allowable as depending from an allowable base claim. Dependent claims 34-38 and 41 are also allowable for their own recited features that, in combination with those recited in claim 33, are not shown by the Office to be disclosed in Lin.

Thus, Applicant respectfully submits that the Office has failed to show that each and every feature is disclosed, and thus the claims are not anticipated by Lin. Applicant respectfully requests that the § 102 rejections be withdrawn.

## CLAIM REJECTIONS UNDER 35 U.S.C. § 103

**Claims 9, 15, 23, 30 and 40** stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,369,835 B1 (Lin et al.) in view of U.S. Patent No. 6,266,053 B1 (French et al.). Applicant respectfully traverses the rejection.

**Dependent claim 9** recites "a method as described in claim 1, wherein at least one said node is specified as read-only."

Applicant respectfully submits that no such method is disclosed, taught, or suggested by Lin and/or French.

### *References Fail to Disclose, Teach, or Suggest the Claimed Method*

First, Applicant submits that Lin fails to disclose, teach or suggest those features of independent claim 1. The Office cites the following from Lin as disclosing the claimed software components: Column 12, lines 53-65; Column 13, lines 3-17 and lines 18-37; and Column 18, lines 20-24. However, no where in these cited sections does Lin disclose, teach, or suggest the claimed software component. Rather, the cited sections from Columns 12 and 13 describe transforming objects in the slide show presentation into audio tracks for a movie file. (Col. 4, lines 59-60). Column 18 of Lin describes a movie within a movie and an inline movie option. (Col. 18, lines 20-24). For the convenience of the Office these cited sections are excerpted below.

> **Lin Reference**
> The logic in FIG. 9 moves from a start block to a decision block 240 where a test is made to determine whether the background audio for a slide(s) in the presentation is selected for saving in the movie file. If true, the logic moves to a block 242 where a background audio sample

is generated and added to an audio track that is associated with a video sample in the movie file that corresponds to the slide(s) in the presentation that has background audio. The background audio sample may be selected to run from the start of playing the movie file until its end, or it may be selected to run for a defined interval. It is also envisioned that several background audio tracks may be included in the movie file. (Col. 12, lines 53-65).

Next, the logic proceeds from the block 242 to a decision block 244 where a test is made to determine if voice narration audio is selected to be included in the movie file. Also, if the determination at the decision block 240 is false, the logic will advance directly to the decision block 244. When the determination at the decision block 244 is true, i.e., voice narration audio is selected for the movie file, the logic proceeds to a block 246 where voice narration audio samples are generated and added to a voice narration audio track that is associated with (same start time as) a video sample in the movie file that corresponds to the slide(s) in the presentation that has voice narration audio. Typically, one audio narration track is provided for each narrated slide. However, it is also envisioned that multiple audio narration tracks may be provided for a narrated slide. (Col. 13, lines 3-17).

The logic proceeds from the block 246 to a decision block 248 where a test is made to determine if sound effect audio is selected to be included with an object in the movie file. Also, if the determination at the decision block 244 is false, the logic will advance directly to the decision block 248. If the determination at the decision block 248 is true, i.e., the sound effect audio is selected for an object(s) in the movie file's video sample, the logic proceeds to a block 250 where a sound effect audio sample(s) are generated and added to the sound effect audio track(s) in such a way that they are linked to the object(s) in the movie file for complete playback when the object(s) is selected. When the display (or activation of interactive sprite) of the linked object is selected during the play back of the movie file, the associated sound effect audio sample(s) are played. The present invention can provide one sound effect track in the movie file for each slide associated with an object with a sound effect. It is also envisioned that sound effect references may be disposed on a single track and each reference would point

to a sound effect sample that resides in an audio media included with the movie file. (Col. 13, lines 18-37).

Additionally, it is envisioned that the movie within a movie and the inline movie option may be employed to integrate home video clips and video clips from other application into the play back of the movie file for the slide show presentation. (Col. 18, lines 20-24).

Applicant's amended claim 1 recites "*dividing the media timeline into one or more presentations, wherein each said presentation describes a rendering of the media for a particular interval of time, and wherein each said presentation describes a collection of software components that, when executed, provides the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink.*" To assist the Office in appreciating the claimed subject matter, the following excerpt is reproduced from the Applicant's Specification.

### *Applicant's Specification, [0051 and [0052]*

In an embodiment, the media foundation 204 exposes one or more application program interfaces that can be called by the application 202 to interact with the media 206(g). For example, the media foundation 204 may be thought of as existing at an "infrastructure" level of software that is executed on the computer 102 of FIG. 1. In other words, the media foundation 204 is a software layer used by the application 202 to interact with the media 206(g). The media foundation 204 may be utilized to control a number of aspects of the media 206(g), such as output, rendering, storage, and so on. Thus, the media foundation 204 may be utilized such that each application 202 does not have to implement separate code for each type of media 206(g) that may be used in the system 200. In this way, the media foundation 204 provides a set of reusable software components to do media specific tasks.

The media foundation 202 may utilize several components among which include the media timeline 122, the timeline source 124, a media source 210, a media processor 212, a media session 214, the media engine 208, a source resolver 216, one or more transforms 218, one or more media sinks 220, 222, and so on. One advantage of various illustrated and described embodiments is that the system 200 is a pluggable model in the sense that a variety of different kinds of components can be utilized in connection with the systems described herein. Also included as a part of system 200 is a destination 224, which is discussed in more detail below. In at least one embodiment, however, the destination 224 is an object that defines where a presentation is to be presented (e.g. a window, disk file, and the like) and what happens to the presentation. That is, the destination may correspond to one or more of the media sinks 220, 222 into which data flows.

As the Office has failed to show that Lin discloses these recited features, Applicant respectfully submits that Lin does not disclose, suggest, or teach the claimed software components. Therefore, as dependent claim 9 depends directly from claim 1 it is allowable by virtue of this dependency.

Further, Applicant agrees with the Office that Lin fails to teach a node is specified as read-only. *See* Office Action, page 13. Applicant submits that French fails to compensate for the deficiencies of Lin. French is directed towards a technique for representing a time varying visual scene as a directed acyclic graph of data and operators that generates a sequence of image frames over specified time intervals. (Col. 3, lines 46-50). The system provides object-oriented representations for the scene in the form of an object catalog and project catalog. (Col. 7, lines 33-35).

Thus, Lin and French, alone or in combination, do not disclose, teach or suggest *"a method as described in claim 1, wherein at least one said node is specified as read-*

*only,*" as recited in Applicant's claim 9. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections made under § 103 and thus Applicant respectfully requests that the § 103 rejection be withdrawn.

**Dependent claim 15** recites "*a method as described in claim 12, wherein: each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation.*"

Applicant respectfully submits that no such method is disclosed, taught, or suggested by Lin and/or French.

### *References Fail to Disclose, Teach, or Suggest the Claimed Method*

Applicant submits that Lin fails to disclose, teach or suggest those features of independent claim 12. Applicant's amended claim 12 recites "*rendering the media timeline to output each said presentation, wherein the rendering further comprises dividing the media timeline into one or more presentations such that each said presentation describes a collection of software components utilized to render said media for a particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink.*" Applicant respectfully submits that the Office has failed to show that Lin discloses, teaches, or suggests such a method and claim 12 is allowable for reasons similar to those above when discussing

claim 1 with respect to claim 9. Therefore, as dependent claim 15 depends directly from claim 12 it is allowable by virtue of this dependency.

Further, Applicant agrees with the Office that Lin fails to teach each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation. *See* Office Action, page 13.

Applicant submits that French fails to compensate for the deficiencies of Lin. French is directed towards a technique for representing a time varying visual scene as a directed acyclic graph of data and operators that generates a sequence of image frames over specified time intervals. (Col. 3, lines 46-50). The system provides object-oriented representations for the scene in the form of an object catalog and project catalog. (Col. 7, lines 33-35).

Thus, Lin and French, alone or in combination, do not disclose, teach, or suggest "*a method as described in claim 12, wherein: each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation,*" as recited in Applicant's claim 15. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections made under § 103 and thus Applicant respectfully requests that the § 103 rejection be withdrawn.

**Dependent claim 23** recites *"the one or more computer-readable media as described in claim 20, wherein: each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation."*

Applicant respectfully submits that no such computer-readable media is disclosed, taught, or suggested by Lin and/or French.

### *References Fail to Disclose, Teach, or Suggest the Claimed Computer-Readable Media*

Applicant submits that Lin fails to disclose, teach or suggest those features of independent claim 20. Applicant's amended claim 20 recites *"each said presentation describes rendering of respective said media for a particular interval of time, wherein each said presentation describes a collection of software components that, when executed, provide the described rendering of said media for the particular interval of time, and wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink."* Applicant respectfully submits that the Office has failed to show that Lin discloses, teaches, or suggests such a computer-readable media and claim 20 is allowable for reasons similar to those above when discussing claim 1 with respect to claim 9. Therefore, as dependent claim 23 depends directly from claim 20 it is allowable by virtue of this dependency.

Further, Applicant agrees with the Office that Lin fails to teach each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation. *See* Office Action, page 13.

Applicant submits that French fails to compensate for the deficiencies of Lin. French is directed towards a technique for representing a time varying visual scene as a directed acyclic graph of data and operators that generates a sequence of image frames over specified time intervals. (Col. 3, lines 46-50). The system provides object-oriented representations for the scene in the form of an object catalog and project catalog. (Col. 7, lines 33-35).

Thus, Lin and French, alone or in combination, do not disclose, teach, or suggest "*the one or more computer-readable media as described in claim 20, wherein: each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation,*" as recited in Applicant's claim 23. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections made under § 103 and thus Applicant respectfully requests that the § 103 rejection be withdrawn.

**Dependent claim 30** recites "*a system as described in claim 26, wherein each said presentation: describes a respective partial topology that reference one or more software components that, when executed, provide the described rendering; and the*

*respective partial topology is for resolving into a full topology that references each*

*software component that provide the rendering."*

Applicant respectfully submits that no such system is disclosed, taught, or

suggested by Lin and/or French.

### References Fail to Disclose, Teach, or Suggest the Claimed System

Applicant submits that Lin fails to disclose, teach, or suggest the features of

independent claim 26. As discussed above with respect to claim 9, the Office has failed

to show that Lin discloses a system comprising the claimed collection of software

components. Further, the Office has failed to show that Lin discloses the claimed

dynamic loading. The Office cites Column 10, lines 43-54 of Lin as meeting the

limitation of dynamic loading. For the convenience of the Office, this cited section is

excerpted below.

### Lin Reference, Col. 10, lines 43-54

> The present invention defines a sample to be a chunk of
> data such as video, audio and text that is generated from
> transforming objects in the slide show presentation. A
> video media is employed as a container for the video
> samples in the movie data and an audio media is used as a
> container for the audio samples. The movie data includes
> a track data structure that references the segment
> (position) on the track occupied by a sample to the
> corresponding order and timing of the corresponding
> object(s) in the slide show presentation. Each track is a
> timeline with marks (references) that denote when the
> movie API should begin playing samples from an
> identified media (container).

However, Lin does not disclose the claimed dynamic loading. Rather, as stated in

the cited section, Lin discloses movie data that includes a track data structure where each

track is a timeline with marks (references) that denote when the movie API should begin playing samples from an identified media (container). (Col. 10, lines 48-54).

In contrast, Applicant's amended claim 26 recites *"rendering of the one or more presentations, wherein each said presentation describes rendering of said media for a particular interval of time, and wherein each said presentation describes a collection of software components configured for dynamic loading such that the collection of software components provide the described rendering of the media for the particular interval of time, wherein the collection of software components include a transform and comprise at least one of a timeline source, a media source, a media session, a media engine, a source resolver, and a media sink and are loaded only when needed."* To assist the Office in appreciating the claimed subject matter, Applicant provides the following illustrative excerpt from Applicant's Specification.

### *Applicant's Specification, Page 40-41, Paragraph [00122]*

Dynamic creation and loading of nodes of a media timeline may be utilized for efficient rendering of the media timeline. By improving rendering efficiency, the media timeline may be utilized on low resource devices, such as devices having limited hardware and/or software resources. For example, dynamic creation of the media timelines may include delayed creation of the nodes of the media timeline. The children of a parent node, for instance, need not be created until needed. The delayed creation of the nodes may be utilized to improve start-up and response times for media timelines having a significant number of nodes and/or a large amount of data for each node. For instance, a media player may be utilized to create and playback a playlist from a media library that contains a significant number of selections. Creating such a playlist might require multiple queries to the media library, which may take a significant amount of time, processor and memory resources. By using delayed creation of the nodes, the playlist can be built on an "as needed" basis, thereby utilizing only as much processing

and memory resources as required by the nodes needed at any one particular time. There are a wide variety of implementations that may be utilized for dynamic creation and/or loading of nodes of a media timeline.

Applicant respectfully submits that the Office has failed to show that Lin discloses, teaches, or suggests such a system and claim 26 is allowable. Therefore, as dependent claim 30 depends directly from claim 26 it is allowable by virtue of this dependency.

Further, Applicant agrees with the Office that Lin fails to teach each said presentation describes a respective partial topology of software components; and the respective partial topology is for resolving into a full topology that references each software component utilized to provide a respective said presentation. *See* Office Action, page 13.

Applicant submits that French fails to compensate for the deficiencies of Lin. French is directed towards a technique for representing a time varying visual scene as a directed acyclic graph of data and operators that generates a sequence of image frames over specified time intervals. (Col. 3, lines 46-50). The system provides object-oriented representations for the scene in the form of an object catalog and project catalog. (Col. 7, lines 33-35).

Thus, Lin and French, alone or in combination, do not disclose, teach, or suggest *"a system as described in claim 26, wherein each said presentation: describes a respective partial topology that reference one or more software components that, when executed, provide the described rendering; and the respective partial topology is for resolving into a full topology that references each software component that provide the*

*rendering.*" as recited in Applicant's claim 30. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections made under § 103 and thus Applicant respectfully requests that the § 103 rejection be withdrawn.

**Dependent claim 40** recites *"the timeline source as described in claim 33, wherein at least one said node is specified as read-only."*

Applicant respectfully submits that no such timeline source is disclosed, taught, or suggested by Lin and/or French.

### *References Fail to Disclose, Teach, or Suggest the Claimed Timeline Source*

Applicant submits that Lin fails to disclose, teach or suggest those features of independent claim 33. Applicant's claim 33 recites *"means for dividing a media timeline into one or more presentations each describing a rendering of one or more media during a particular interval of time, wherein the media timeline exposes a plurality of nodes to the plurality of applications, wherein one or more said nodes reference respective said media, and wherein the media timeline is configured for dynamic loading such that metadata included in at least one said node specifies a collection of said nodes to be loaded when the media timeline is rendered,."* Applicant respectfully submits that the Office has failed to show that Lin discloses, teaches, or suggests such a timeline source and claim 33 is allowable for reasons similar to those above when discussing claim 26 with respect to claim 30. Therefore, as dependent claim 40 depends directly from claim 33 it is allowable by virtue of this dependency.

Further, Applicant agrees with the Office that Lin fails to teach a node is specified as read-only. *See* Office Action, page 13. Applicant submits that French fails to compensate for the deficiencies of Lin. French is directed towards a technique for representing a time varying visual scene as a directed acyclic graph of data and operators that generates a sequence of image frames over specified time intervals. (Col. 3, lines 46-50). The system provides object-oriented representations for the scene in the form of an object catalog and project catalog. (Col. 7, lines 33-35).

Thus, Lin and French, alone or in combination, do not disclose, teach or suggest *"the timeline source as described in claim 33, wherein at least one said node is specified as read-only,"* as recited in Applicant's claim 40. Accordingly, Applicant submits that the evidence relied upon by the Office does not support the rejections made under § 103 and thus Applicant respectfully requests that the § 103 rejection be withdrawn.

## CONCLUSION

Claims 1, 4, 6-15, 17-20, 23-26, 29-38, 40, and 41 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contact the undersigned attorney to resolve the issue.

Respectfully submitted,

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